

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

**HAZEL ROBY, as Administratrix of
The Estate of RONALD TYRONE
ROBY, Deceased,**

Plaintiff,

v.

BENTON EXPRESS, INC.,

Defendant.

Civil Action No.: 2:05cv194-T

PLAINTIFF'S SUPPLEMENTAL RULE 26(b) SUBMISSIONS


M. P. STIRLING

Ms. M. P. Stirling, 9 Crestwood Court, Millbrook, Alabama, 36054. Ms. Stirling may be called to testify as an accident reconstructionist at the trial of this matter. Ms. Stirling was a State Trooper for the State of Alabama for sixteen (16) years and investigated numerous accidents during this time. Ms. Stirling has completed over 1000 hours of specialized education in the field of accident reconstruction. Ms. Stirling's expert opinions will also be based on her work experience as an Alabama State Trooper as well as her educational background which are set out more fully in the attached CV. Plaintiff reserves the right to supplement these opinions and provide rebuttal testimony to Defendant's experts. Plaintiff further reserves the right to supplement these opinions as additional discovery is obtained.

Ms. Stirling will offer opinions concerning accident reconstruction in this matter. Ms. Stirling's reconstruction will corroborate, clarify, and expound on the information revealed in the police report. Ms. Stirling may testify concerning the speed, direction,

and path of the truck and its final point of rest. Ms. Stirling will also discuss other elements of accident reconstruction, such as perception and reaction time or the lack thereof of a driver such as Mr. Roby or Craig Anthony Stephens based on the circumstances of the wreck. Ms. Stirling will also give opinions concerning the direction and location of Mr. Roby at the time of the wreck and the direction and location of Benton Express' employee Craig Anthony Stephens immediately before the wreck. Ms. Stirling may also opine about Benton's contact with authorities and the timing of that contact and what authorities can do based on the reports made by Benton.

More specifically, Ms. Stirling will testify that Mr. Craig Anthony Stephens was traveling south on Interstate 85 and that Mr. Roby was traveling south on Interstate 65. As Mr. Stephens approached the I85/I65 south interchange, Ms. Stirling will also opine that Mr. Stephens was operating his vehicle in excess of 59 miles per hour as he went over the barrier guard on the I85/I65 interchange. She will opine that the truck collided with Mr. Roby's vehicle. She may also opine that there is a difference between an overdue vehicle report and a stolen vehicle report. An overdue vehicle report has a lower priority for a state trooper – no crime has been alleged or committed. A stolen vehicle report receives a high priority since it involves an actual criminal act. She also will testify that based on discovery produced by Defendants there is no evidence to support any report was made to the Alabama authorities.



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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document on all counsel of record by facsimile transmission and by placing a copy in the United States mail, postage prepaid and properly addressed to him on this the 29th day of October 2005.



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